



Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20054

June 7, 2018

**Re: Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. 160(c) to Accelerate Investment in Broadband and Next-Generation Networks, WC Docket No. 18-141**

Dear Ms. Dortch,

We write to you as a 25 year community network that through a local partner services a variety of wireline customers in the Greater Sacramento CA market. Local ISP companies in our market began leasing access to Pacific Bell copper in 1999, and now do so through a nearby CLEC. Vendors we use today, rely on unbundled network elements (UNEs) to provide service to literally thousands of Californians. These UNEs can provide good speeds as well, using VDSL2+ technologies, the CLEC vendors are able to deliver 100 Mbps on one copper pair in core areas around ILEC Central Offices.

In 2018, there is a substantial CLEC market segment in the US. Many product technologies such as Ethernet over Copper, and G.Fast DSL services that are developed and marketed by many CLECs over UNEs. We believe this petition of forbearance is misguided, will substantially cripple a thriving industry and deliver fewer choices and poorer services to citizens. Since so much revenue going to local ISP companies, comes through the resale of UNEs our 25 year old community network believes Internet Access competition from a local level would be severely compromised and some long time operators would be forced to close, just at the time we are moving to build out much needed fiber optic infrastructure in our community.

Since this is such a complicated topic we support California PUC's motion for an extension of the comments filing period. Further, since we believe this will have a devastating impact to the remaining independent small Data, Voice, and Wireline communications operators, our company supports INCOMPAS' motion<sup>2</sup> to dismiss this petition.

Sincerely

Robert Nickerson  
Director, Davis Community Network

1) Motion for Extension of Time of the California Public Utilities Commission, WC Docket No. 18-141 (May 18, 2018).

2) Motion to Dismiss of INCOMPAS, WC Docket No. 18-141 (May 11, 2018).